

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**CHRISTINA PADILLA and JESSICA
ZAMUDIO, individually
and on behalf of others similarly
situated,**

Plaintiffs,

v.

**RUBY FOODS, INC., STANDARD
FOODS, INC., MOONSTONE FOODS
ENTERPRISES, LLC, SIRAJUDDEN
VIRANI and FAISAL MERCHANT,**

Defendants.

CASE NO. 1:16-cv-4936

Judge Joan B. Gottschall

Magistrate Judge Young Kim

**PLAINTIFFS' UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF A
CLASS AND COLLECTIVE ACTION SETTLEMENT; CONDITIONAL
CERTIFICATION OF SETTLEMENT CLASSES; DESIGNATION OF CLASS
REPRESENTATIVES AND APPOINTMENT OF PLAINTIFFS' COUNSEL; AND
APPROVAL OF THE FORM AND MANNER OF CLASS SETTLEMENT NOTICE**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs ask the Court to enter an order:

1. Preliminarily approving the class-wide Settlement Agreement negotiated by Plaintiffs and Defendants;
2. Conditionally certifying the proposed class for settlement purposes only;
3. Designating Christina Padilla and Jessica Zamudio as Class Representatives and their attorneys as Class Counsel;
4. Approving the form and manner of class notice; and
5. Setting a date for a final fairness hearing.
6. A draft order is attached to the memorandum of law filed in support of this motion.

WHEREFORE, Plaintiffs request entry of the attached draft order or a similar order.

Respectfully submitted,

/s/ Christopher J. Wilmes

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